

EXHIBIT D

09:14AM 1 AND CONFIDENTIALITY OBLIGATIONS. IN FACT, YOU'LL SEE A PERSON
09:14AM 2 CALLED TOMO KIMURA, AND HIS COMPUTER WAS HACKED AT ONE OF THESE
09:14AM 3 LABS AND THE DATA WAS LEAKED AND THE COMPUTER HAD TO BE
09:14AM 4 REBUILT.

09:14AM 5 SO THERE IS NOTHING IN TERMS OF AN AUDIT INSPECTION
09:14AM 6 RIGHTS. THERE WERE NO FACILITY SECURITY MEASURES, LIKE THERE
09:14AM 7 WAS NO LOCKED CABINETS. THERE WAS NOT A CLEAN DESK POLICY.
09:14AM 8 LITERALLY ANY EMPLOYEE COULD JUST WALK IN, LOG ON TO A COMPUTER
09:14AM 9 AND START WORKING ON THAT CUSTOMER LIST.

09:14AM 10 AND THAT CUSTOMER LIST, IN 2015, EXCEPT SOME OF THE HIGH
09:14AM 11 LEVEL EMPLOYEES LIKE MAYBE SUE ZHAO, RICHARD, AND GANGYOU WANG,
09:14AM 12 MOST JUST HAD A READ-ONLY ACCESS TO THAT CUSTOMER LIST. SO
09:14AM 13 THEY COULDN'T MODIFY, BUT IT WAS READ-ONLY.

09:14AM 14 SO, FOR EXAMPLE, WHEN ALAN LI STARTED WORKING AT RUIFENG,
09:15AM 15 HE COULD MAYBE SOMETIMES READ-ONLY, BUT I DON'T EVEN THINK HE
09:15AM 16 HAD ACCESS IN 2015 TO A CUSTOMER LIST. HE WAS ONLY AS SOME
09:15AM 17 KIND OF UNPAID INTERN, A JOB SHADOWER, AND THEN A LAB
09:15AM 18 ASSISTANT.

09:15AM 19 AND WHEN THEY TALK ABOUT A CUSTOMER LIST, IT WAS NOT QUITE
09:15AM 20 WHAT THEY THINK IT TO BE NOW IN 2023. NOW, BECAUSE SUE AND
09:15AM 21 RICHARD WANTED TO SET UP THIS BOSTON LAB, THEY ACTUALLY FILED A
09:15AM 22 FRIVOLOUS LAWSUIT AGAINST GANGYOU WANG TO SHUT DOWN HIS
09:15AM 23 OPERATION SO THEY COULD ACTUALLY TAKE THAT CUSTOMER LIST AND
09:15AM 24 WORK IN BOSTON WITH IT.

09:15AM 25 THAT IS THE MOTIVATION OF THEM FILING THIS LAWSUIT.